

# REYNOLDS, CARONIA, GIANELLI & LA PINTA, P.C.

- ATTORNEYS AT LAW -

200 VANDERBILT MOTOR PARKWAY  
SUITE C-17  
HAUPPAUGE, NEW YORK 11788

300 OLD COUNTRY ROAD  
SUITE 341  
MINEOLA, NEW YORK 11501  
(Correspondence to Hauppauge Office)

ANTHONY M. LA PINTA  
JAMES T. REYNOLDS  
PETER R. CARONIA (Ret.)  
PAUL GIANELLI (Ret.)

TEL: 631-231-1199  
FAX: 631-300-4380

OF COUNSEL

PETER H. MAYER, III, PLLC.  
Justice, NYS Supreme Court (Ret.)

MICHAEL E. FEHRINGER  
KYLE O. WOOD

MARK D. COHEN  
Judge, NYS Court of Claims (Ret.)

CHRISTOPHER J. PURCELL, P.C.

**BY ECF**

August 1, 2024

The Honorable Lee G. Dunst  
Magistrate Judge, United States District Court, EDNY  
Alphonse M. D'Amato Federal Building  
100 Federal Plaza  
Central Islip, NY 11722-4454

Re: Hasper v. County of Nassau, et. al.  
United States District Court, EDNY  
2:20 CV 2349 (RER) (LGD)

Dear Magistrate Judge Dunst:

Kindly accept this joint discovery status report regarding the above matter.

Since our last update, the parties have conferred on numerous occasions to continue to develop a comprehensive deposition calendar. We were prepared to depose a non party fact witness this past Tuesday, however the deposition required an adjournment because the witness did not respond to her subpoena. Additional depositions will start on August 15<sup>th</sup> and continue forward for the next two months. When developing the time table for this schedule, we accounted for unexpected cancellations and adjournments.

Therefore, the parties are on course to meet our deadlines and calendar obligations to the Court.

Deputy Nassau County Attorney Brian McLaughlin, counsel for the defendants, has reviewed this correspondence and has authorized it's submission.

Please notify me if you are in need of anything further.

Respectfully submitted,



**ANTHONY M. LA PINTA**  
AML:mm

cc: Brian McLaughlin, Esq. (by email)  
William Hasper (by email)